

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

Special Master: David T. Moran

**UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL AND TO EXTEND  
TIME LIMIT UNDER LOCAL RULE CV-5(a)(7)(E)**

Plaintiff States respectfully move the Court for leave to file under seal Plaintiff States' Response to Google's Motion to Exclude, and Declaration of Noah S. Heinz in Support of Plaintiff States' Opposition to Google's Motion to Exclude and all attached exhibits. Plaintiff States will file these documents today. Defendant Google LLC ("Google") does not oppose this motion.

Because Plaintiff States' filings are voluminous and contain information subject to Google's claims of confidentiality pursuant to the Confidentiality Order, Dkt. 182, Plaintiff States seek permission to file these papers under seal in the first instance and to extend the time limit under Local Rule CV-5(a)(7)(E) for Google to submit redacted versions of these filings from seven to 21 days.

Google sought to file its Motions for Summary Judgment, Motion to Exclude, and accompanying documents under seal in the first instance, and sought to extend the time limit for filing redacted versions of these documents from seven to 21 days. Dkts. 665, 666, 670. The Court granted that relief, Dkt. 685, and should implement the same process with respect to Plaintiff States' responsive filings. *See Carranza v. Shelton & Valadez, P.C.*, No. SA-22-CV-00025-ESC,

2023 WL 3260544, at \*1 (W.D. Tex. May 4, 2023) (discussing court's inherent power to manage its docket).

The Court should therefore grant Plaintiff States' unopposed motion to seal the above documents and to extend the limit for filing redacted versions under Local Rule CV-5(a)(7)(E) from seven to 21 days.

DATED: December 9, 2024

Respectfully submitted,

/s/ W. Mark Lanier

W. Mark Lanier

[Mark.Lanier@LanierLawFirm.com](mailto:Mark.Lanier@LanierLawFirm.com)

Alex J. Brown

[Alex.Brown@LanierLawFirm.com](mailto:Alex.Brown@LanierLawFirm.com)

Zeke DeRose III

[Zeke.Derose@LanierLawFirm.com](mailto:Zeke.Derose@LanierLawFirm.com)

Jonathan P. Wilkerson

[Jonathan.Wilkerson@LanierLawFirm.com](mailto:Jonathan.Wilkerson@LanierLawFirm.com)

10940 W. Sam Houston Pkwy N.

Suite 100

Houston, TX 77064

(713) 659-5200

/s/ Ashley Keller

Ashley Keller

[ack@kellerpostman.com](mailto:ack@kellerpostman.com)

Kiran N. Bhat

[kiran.bhat@kellerpostman.com](mailto:kiran.bhat@kellerpostman.com)

2333 Ponce De Leon Boulevard

Suite R-240

Coral Gables, Florida 33134

(833) 633-0118

Zina Bash (Bar No. 24067505)

[zina.bash@kellerpostman.com](mailto:zina.bash@kellerpostman.com)

111 Congress Avenue, Suite 500

Austin, TX 78701

(512) 690-0990

**THE LANIER LAW FIRM, PLLC**

*Counsel for Texas, Idaho, Louisiana (The Lanier Law Firm only), Indiana, Mississippi, North Dakota, South Carolina, and South Dakota*

*Submitted on behalf of all Plaintiff States*

/s/ Noah S. Heinz

Noah S. Heinz

[noah.heinz@kellerpostman.com](mailto:noah.heinz@kellerpostman.com)

1101 Connecticut Ave., N.W., Suite 1100

Washington, DC 20036

(202) 918-1123

**KELLER POSTMAN LLC**

**NORTON ROSE FULBRIGHT US LLP**

Joseph M. Graham, Jr.

[joseph.graham@nortonrosefulbright.com](mailto:joseph.graham@nortonrosefulbright.com)

Geraldine Young

[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)

1550 Lamar Street, Suite 2000

Houston, Texas 77010

(713) 651-5151

Marc B. Collier

[Marc.Collier@nortonrosefulbright.com](mailto:Marc.Collier@nortonrosefulbright.com)

98 San Jacinto Blvd., Suite 1100

Austin, Texas 78701

(512) 474-5201

FOR PLAINTIFF STATE OF TEXAS

KEN PAXTON

Attorney General

*/s/ James R. Lloyd*

Brent Webster, First Assistant Attorney General of Texas

[Brent.Webster@oag.texas.gov](mailto:Brent.Webster@oag.texas.gov)

James R. Lloyd, Deputy Attorney General for Civil Litigation

[James.Lloyd@oag.texas.gov](mailto:James.Lloyd@oag.texas.gov)

**STATE OF TEXAS, OFFICE OF THE ATTORNEY GENERAL**

P.O. Box 12548

Austin, TX 78711-2548

(512) 936-1674

*Attorneys for Plaintiff State of Texas*

**CERTIFICATION OF CONFERENCE**

I certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that Google LLC does not oppose the foregoing sealing request.

/s/Noah S. Heinz  
Noah Heinz

**CERTIFICATE OF SERVICE**

I certify that on December 9, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/Noah S. Heinz  
Noah Heinz